

## Tijuana River National Estuarine Research Reserve

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I have reviewed the DSEIS for Clean Water Compliance at the South Bay International Wastewater Treatment Plant (SBIWTP), and have several comments. In general, while I certainly support efforts to deal with the monumental wastewater problems in the Tijuana River and Estuary, I feel that the efforts outlined in the DSEIS will fall short of a real solution. The chronic sewage pollution that occurs during the rainy season will likely continue to be a major problem with any of the alternatives, and a truly comprehensive approach that addresses *inter alia* the sources of the wastewater and the infrastructure in Mexico are needed.

In general, there also is inadequate information on potential impacts in Mexico, especially given that the desired alternative is the Bajagua project. Although there may be legal reasons for this, a watershed approach is really needed. Gravity dictates that any changes upstream will affect what happens down here. To that end, is there a report available in Spanish? (If so, it is not readily accessible). Was outreach in Mexico conducted, and particularly in the Alamar River Valley? There was a particular lack of information about the location and potential impacts of the actual Bajagua project, making it difficult to weigh this alternative against others. For example, what sensitive species are in the project footprint of the Bajaqua plant itself? Also, are there adequate assessments of the flood hazards and fluvial geomorphology? How can spillage of untreated wastewater during flood events be prevented? Is there a baseline analysis of flooding and sedimentation in the Alamar River Valley? Has there been a review of other planning efforts for the Alamar River (e.g., IMPlan's efforts to create a riverpark in the Alamar River)? Also, it seems a little odd to have this one private proposal considered, but no others.

Thank you in advance for the taking the time to consider these suggestions.

Sincerely,



Jeffrey Crooks, Ph.D.  
Research Coordinator